

# United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

AUG 22 2014

UNITED STATES OF AMERICA  
V.

David J. Bradley, Clerk  
CRIMINAL COMPLAINT

Consuelo Carrillo-Hernandez PRINCIPAL Mexico  
A202 083 035 YOB: 1974  
Jose Guadalupe Santiago-Ramon CO-PRINCIPAL Mexico  
A206 686 593 YOB: 1985

Case Number:

M-14-1634-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 21, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Felipe Estevez-Matias and Alexander Cornejo-Rivera, citizens and nationals of Mexico, and Bernie Efrain Garcia-Yoc, citizen and national of Guatemala, along with nineteen (19) other undocumented aliens for a total of twenty-two (22), who had come to, entered, or remained in the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

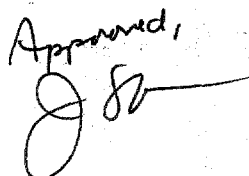
On August 20, 2014 Border Patrol Agents (BPAs) were conducting patrol duties on Highway 281 near San Manuel, Texas. While doing so, they encountered an abandoned vehicle on the side of the road and canvassed the area for any subjects. Agents then found several foot tracks leading away from the vehicle into brushy area. Agents followed the foot tracks and were able to locate 11 subjects who admitted to being illegally present in the United States. All were then taken into custody for processing.

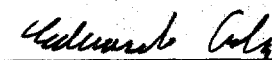
During questioning, one subject identified as Bernie Efrain Garcia-Yoc, provided information regarding his smuggling arrangements and a detailed description as to where he was being harbored in Edinburg, Texas. Based on the information, Agents conducted a custodial escort in an effort to locate the harboring location where Garcia-Yoc was held. Garcia-Yoc positively identified 1741 Rosalia Circle as the residence and at the time Agents drove by, a heavy set female was walking out of the house next door. Garcia-Yoc then informed Agents the female was the caretaker of the harboring location and she lived next door at 1739 Rosalia Circle. Garcia-Yoc further stated all of the subjects he was arrested with were harbored at the location and transported together prior to their apprehension.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved,  


  
Signature of Complainant

Sworn to before me and subscribed in my presence,

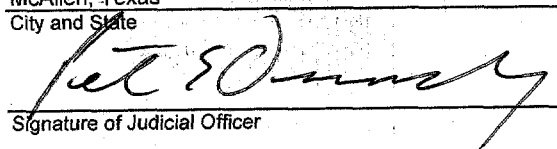
Eduardo Cortez Senior Patrol Agent  
Printed Name of Complainant

August 22, 2014  
Date

8:59 am at

McAllen, Texas  
City and State

Peter E. Ormsby U. S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1634-M**

**RE:        Consuelo Carrillo-Hernandez                    A202 083 035**  
             Jose Guadalupe Santiago-Ramon                A206 686 593

**CONTINUATION:**

Agents then proceeded to conduct a consent to search for undocumented aliens at the residence. Agents approached 1739 Rosalia Circle where the female presumably lived. At the same time, several subjects were observed climbing out of the windows at 1741 Rosalia Circle making an attempt to abscond. Both properties were connected by a gate which was left open so Agents were able to control the situation and ultimately were granted consent to enter both residences. The female described by Garcia-Yoc was found at her residence and identified as Consuelo Carrillo-Hernandez. She claimed to be illegally present in the United States. Twelve subjects were also found at the other residence and all admitted to being illegally present in the U.S. As Agents searched Carrillo-Hernandez's residence, they found a document indicating she was the owner of the residence where the illegal aliens were found and had entered into a rental agreement with a subject. All of the subjects were then taken into custody for further questioning and processing.

At the station, material witnesses were found identifying two individuals linked to alien smuggling in this case. Consuelo Carrillo-Hernandez was identified as a caretaker and Jose Guadalupe Santiago-Ramon was identified as a foot guide.

**Principal Statements:**

1. Consuelo Carrillo-Hernandez was interviewed and claimed to be a citizen of Mexico. She advised Agents she did not wish to provide a statement without an attorney present and no further questions were asked.
2. Jose Guadalupe Santiago-Ramon was also interviewed and claimed to be a citizen of Mexico. He was read his Miranda Rights and provided a statement without an attorney present. Santiago claimed after his entry into the U.S., he was taken to a stash house and transferred from several vehicles ultimately arriving at the harboring location where he was arrested. He denied having any knowledge as to who was the caretaker or being involved in any illegal activity.

**Material Witness Statements:**

All of the material witnesses were read their Rights and provided a statement.

1. Felipe Estevez-Matias claimed to be a citizen of Mexico and illegally entered into the U.S. He stated he paid \$3,000 as his smuggling fee to be smuggled into the U.S. After his entry, Estevez was ultimately transported to the harboring location where he was arrested at. He identified a male subject who arrived on today's date (8/21) as the person he suspected to be in charge. The man provided water, eggs, beans, and tortillas and he informed them he was the foot guide and would be taking them out on Sunday to walk through the brush up north. Estevez identified Jose Guadalupe Santiago-Ramon as the male subject mentioned. Estevez mentioned a heavy set, dark skinned woman who went inside the harboring location and threw out the trash but was unable to identify her.

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**CONTINUATION:**

2. Alexander Cornejo-Rivera claimed to be a citizen of Mexico and illegally entered into the U.S. He stated he paid \$1,000 as an advance for his smuggling fee and arranged to pay an additional \$2,500 once he arrived in Houston. After his entry, Cornejo was taken to a stash house where his information was taken and then he was transferred to the house where he was arrested at. Cornejo remained at the house for 12 days and acknowledged two subjects who were in charge. He stated the man in charge would arrive and take people and guide them through the brush up north. Cornejo identified Jose Guadalupe Santiago-Ramon as the man mentioned. He also noted a woman in charge and advised she would instruct them to remain inside and not look out the windows. She also provided food for them on occasion. Cornejo described there were days when they did not eat and only relied on tap water. He also stated there was only one bathroom for approximately 60 people being harbored at a time.

3. Bernie Efrain Garcia-Yoc claimed to be a citizen of Guatemala and illegally entered into the U.S. He paid a total of \$4,000 as his smuggling fee to be smuggled into the U.S. After his entry, Garcia was ultimately transported to the harboring location he identified to Agents. He stated a heavier set lady that lived next door was in charge. He claimed she would never go inside the house completely but would open the door and scream to not open the windows. Garcia added he was at the stash house for 10 days before being transported out. Garcia identified Consuelo Carrillo-Hernandez as the lady mentioned. He also identified a male subject who was transported out of the house with him who was going to be the foot guide. He stated the foot guide informed them he would not be paid unless they made it across (the checkpoint) and for the group to pay attention to everything he said if they all wanted to make it. Garcia identified Jose Guadalupe Santiago-Ramon as the male subject mentioned. Garcia stated at the time of his arrest, he was travelling with the group which was taken out of the stash house and they were instructed by Santiago-Ramon and another subject to exit the vehicle. Santiago-Ramon continued in the vehicle after they exited and was not seen when they were apprehended.